



Order Filed on August 16, 2022  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1**

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and Debtor-in-Possession*

In re:

NATIONAL REALTY INVESTMENT ADVISORS,  
LLC, *et al.*<sup>1</sup>

Debtors.

Chapter 11


Case No. 22-14539 (JKS)

(Jointly Administered)

**STIPULATION AND CONSENT ORDER EXTENDING THE DEADLINE  
ESTABLISHED BY RULE 3003(a)(1) OF THE LOCAL RULES OF THE UNITED  
STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY**

The relief set forth on the following pages two (2) through four (4) is hereby  
**ORDERED.**

**DATED: August 16, 2022**

  
\_\_\_\_\_  
Honorable John K. Sherwood  
United States Bankruptcy Court

<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors' service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

Debtor: National Realty Investment Advisors, LLC, *et al.*  
Case No: 22-14539 (JKS)  
Caption: Stipulation and Consent Order Extending the Deadline Established by Rule 3003(a)(1) of the Local Rules of the United States Bankruptcy Court District of New Jersey  
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This stipulation and consent order (“**Stipulation and Consent Order**”) is entered into by and between: (i) the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”), (ii) the Official Committee of Unsecured Creditors, and (iii) Porzio, Bromberg & Newman, P.C. in its capacity as lead counsel for certain investors (together, the “**Parties**”).<sup>2</sup>

### RECITALS

**WHEREAS**, D.N.J. LBR 3003-1(a)(1) provides that “[a] creditor (other than a governmental unit) or equity security holder subject to Bankruptcy Rule 3003(c)(2) must file a proof of claim or interest not later than 70 days after the date of the order for relief;”

**WHEREAS**, on August 15, 2022, the Debtors intend to file the *Debtors’ Motion For Entry of an Order (A) Establishing Deadlines to File Proofs of Claim Against and Interests in the Debtors, Including But Not Limited to Claims Arising Under Section 503(b)(9) of the Bankruptcy Code, (B) Approving the Form and Manner of Notice of the Bar Dates, (C) Authorizing Publication of the Bar Dates, and (D) Granting Related Relief* (the “**Bar Date Motion**”); and

**WHEREAS**, in light of the anticipated filing of the Bar Date Motion and to avoid an undue burden on claimants, investors, and the Court by having multiple deadlines to file proofs of claim or interests, the Parties believe that it is necessary and appropriate to extend the deadline established by D.N.J. LBR 3003-1(a)(1).

### STIPULATION AND CONSENT ORDER

**NOW, THEREFORE**, the Parties stipulate and agree, and the Court hereby **ORDERS**, as follows:

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<sup>2</sup> The Office of the United States Trustee has no objection to the relief sought in the Stipulation and Consent Order.

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1. The requirement of Local Bankruptcy Rule 3003-1(a)(1) that proofs of claim by creditors and equity security holders be filed no later than seventy (70) days after the Petition Date is extended through and including the date that is seven (7) days following the hearing on the Bar Date Motion, without prejudice to a further extension of such deadline.

2. This Stipulation and Consent Order shall not apply to the deadlines for filing proofs of claim applicable to governmental units set forth in section 502(b)(9) of the Bankruptcy Code and Local Bankruptcy Rule 3003-1(b)(2).

3. This Stipulation and Consent Order shall be immediately effective and enforceable upon its entry.

4. This Court shall retain exclusive jurisdiction to hear and decide any and all disputes related to or arising from the implementation, interpretation, and enforcement of this Stipulation and Consent Order.

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